

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:

Templeville Post Office
Templeville, Maryland 21670

Docket No. A2011-76

COMMENTS OF UNITED STATES POSTAL SERVICE
(November 9, 2011)

On September 15, 2011, the Postal Regulatory Commission received a letter (Petition) seeking review of the Post Office discontinuance affecting the Templeville, Maryland Post Office. By means of its *Notice and Order Accepting Appeal and Establishing Procedural Schedule*, Order No. 863 (September 20, 2011), the Postal Regulatory Commission (PRC or Commission) docketed the Petition as an appeal of the final determination to discontinue the Templeville, Maryland Post Office, assigning PRC Docket No. A2011-76. That Order, at page 5, set November 9, 2011 as the date for filing of the Postal Service answering brief. This pleading responds to that directive.

As the Final Determination to Close the Templeville, MD Post Office and Extend Service by Rural Route Service¹ observes, the Templeville Post Office is a level C or EAS-53 office open approximately 22 hours per week. The former postmaster retired late in 2010 from an office that has seen recent declines in and modest overall levels of utilization for retail services; so pursuant to then applicable regulations, an evaluation

¹ Various copies of the Final Determination appear in the administrative record, which evidently became jumbled during scanning after counsel received it from the field discontinuance coordinator. As such, the first 29 in the PDF filed with the Commission appear in the correct order; the remaining pages appear thereafter, albeit in reverse order. Hence page 30 is what should have been the last page, that is, page 153. This explains why the 30th PDF page is the Petition on appeal followed by early pleadings from this docket. Copies of the Final Determination can be found at pages 44-38 (round date stamped version posted at the Templeville Post Office), pages 51-45 (posted at Marydel Post Office), and 60-54 (signed version—lacking any round date stamps— together with instructions for posting at the Marydel and Templeville Post Offices).

for possible discontinuance was initiated by district officials. The Templeville Post Office serves 27 P.O. Box customers and averages 10 daily transactions accounting for 11 minutes of workload.

The discontinuance study and Final Determination identify the EAS-16 level Marydel Post Office, located two miles away, as an available source of retail and delivery services; existing P.O. box customers can avail themselves of rural carrier delivery (as the financial calculation conservatively assumes) or one of the over 100 boxes available at Marydel.

The Final Determination identifies specific advantages and disadvantages. Three identified disadvantages include the loss of a postmaster position and retail outlet in the community (offset to some degree by the availability of service via rural carrier), the sometime need to meet the carrier for transacting business, and a change in address (excluding community name and ZIP Code) if customers choose to use carrier delivery. Advantages include avoidance of the need to go to a Post Office to transact retail business (aided by availability of Stamps by Mail order forms), 24-hour access to carrier delivered mail, annual savings for the Postal Service of \$25,627, avoidance of P.O. Box fees, and similar to the first, avoidance of need to visit a Post Office to take delivery of mail.

The Final Determination identifies various concerns raised by customers about the possible effects on postal service, their options for retail and delivery services, prices, and impact upon the community; those concerns are considered and addressed

by the Postal Service, together, in some instances, with strategies for mitigating those concerns.

With respect to community identity, for example, the administrative record fully supports the Final Determination's recitation that community name and ZIP Code will be retained for customers who convert to carrier delivery; moreover, it notes that community identity derives from the interest and vitality of its residents. The Postal Service has accordingly considered the impact upon the community, as it has other issues raised by customers; the Postal Service has considered customer concerns as part of its overall decision to discontinue the Templeville Post Office in favor of rural carrier delivery and the nearby Marydel Post Office.

The Final Determination also addresses the overall financial savings to the Postal Service and the only impact upon employees being potential separation of the noncareer employee acting as the temporary replacement for the postmaster. Hence all of the statutory issues were considered and addressed.

The discontinuance study proceeded conventionally, starting with a "Dear Customer" letter (variously identified as Item 21, Page 21, and located as page 150 of 153 in the PDF of the administrative record filed with the Commission, preceded by the letter's attachments) that described recent declines at the Templeville Post Office, enclosed a questionnaire for each customer, and solicited attendance at a forthcoming community meeting to be held at the Templeville Post Office.

Questionnaires were returned (PDF pages 146-110) and evaluated for customer concerns, with letters then sent back to customers who submitted a questionnaire (PDF

pages 109-99). The summary of customer comments submitted via questionnaire (PDF pages 98-97) are followed by notes from the community meeting (PDF p. 96), the community roster, and a summary of concerns expressed at the meeting (PDF p. 94).

Formal Proposals were posted in the Templeville and Marydel Post Offices together with invitations for comments and the optional comment form. PDF pages 87-70. No comments were received. PDF p. 66. Thereafter, the administrative record was forwarded to Headquarters for consideration of actual discontinuance. The Final Determination was signed as posted, as discussed above.

The Petition itself (September 15, 2011) is the only document or pleading filed in this docket by any customer; it consists of three paragraphs. The first states the intention of appealing; the second acknowledges that Templeville “[does not] have much in it any more, one store”, while criticizing the Postal Service discontinuance action and its impact upon the community. The third sentence appears to criticize the issuance of a particular stamp in 2010. The Postal Service has, however, properly considered the impact upon the community. See² pp. 23 (Item 13, Postmaster Comments, identifying non-residential addressees); 25-26 (Item 15, Post Office Survey Sheet, providing details of the facility housing the Templeville Post Office, surrounding community, lack of handicap access/restroom, unavailability of alternate sites, possible CBU sites, and hours of operation); 27 (Item 16, Community Survey Sheet, identifying sources of government services, absence of expected growth, characteristics of customers); 153 (Item 18, Post Office Closing or Consolidation Proposal Fact Sheet, noting existence of 30-day termination clause in lease, unavailability of alternate

² All cites here are to PDF pages in the form of the administrative record filed with the Commission.

quarters); 97-96 (Item 23, Analysis of Questionnaires, loss of community identity (concerns 4-5)). These concerns and Postal Service responses to them were then picked up each of the Proposal (at 2-3) and Final Determination (at 2-3). Activity in the Templeville Post Office has diminished as the town itself has diminished to the point it has just one store. The Petition thus raises but one issue, and it has been the object of consideration throughout the administrative record and into the Final Determination. As such, the Petition does not raise any issue that has not already been considered, or otherwise challenge the Final Determination.

The Final Determination to discontinue the Templeville Post Office should accordingly be affirmed.

Respectfully submitted,

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